

State of California Business, Consumer Services, and Housing Agency Department of Housing and Community Development Division of Codes and Standards

MOBILEHOME PARKS INSPECTION RESIDENT INFORMATION BOOKLET

- Contains important information for residents of mobilehome parks regarding inspections, violations, and code requirements.
- Please read about the upcoming inspection of your mobilehome park and your lot.
- Save this booklet after the inspection of your mobilehome park is completed as a reference guide of common resident responsibilities.
- Servicios bilingües están disponibles. Para hablar con un representante en español, por favor llame al Centro de Contacto de la División de Códigos y Normas al (800) 952-8356 y pida un intérprete.

Important Information for Residents of Mobilehome Parks About Inspections, Violations, and Code Requirements

California Health and Safety Code Section 18400.1, amended and effective January 1, 2000, requires mobilehome/manufactured home enforcement agencies to enter and inspect mobilehome parks to ensure enforcement of the Mobilehome Parks Act. The California Department of Housing and Community Development, Division of Codes and Standards will be conducting an inspection of the general areas, buildings, equipment, and utility systems of your mobilehome park, as well as each individual lot. A NOTICE OF PLANNED INSPECTION has been posted in a conspicuous location within the mobilehome park to inform residents of the upcoming inspection. The inspection will be conducted within 60 days from the "Date Posted" shown on the Notice of Planned Inspection. At least 30 days prior to the inspection of the upcoming inspection.

Using this Booklet

The Department makes this booklet available to residents and it contains important information about the inspection, violations, and related issues. The Department encourages residents of manufactured home/mobilehome parks to review the information on how to inspect your lot and MH-unit for possible violations, many of which can be easily corrected before the Department's inspection. The information in this booklet is based on the mobilehome park regulations contained in 25 California Code of Regulations. However, it is not the actual regulations.

- Note: The terms "Unit" and "MH-unit" used throughout this booklet are the new referenced terms for manufactured homes, mobilehomes, multi-unit manufactured housing, and recreational vehicles as defined in the California Code of Regulations, Title 25, Division 1, Chapter 2, Article 1, Section 1002. For clarity they are reprinted below.
 - MH-unit: A manufactured home, mobilehome, or multi-unit manufactured housing.
 - Unit: A manufactured home, mobilehome, multi-unit manufactured housing, or recreational vehicle.

Scope of Inspection

The inspection will include the park's common areas, buildings, equipment, and utility systems for proper maintenance and code compliance. Inspection of resident lots will include utility connections, accessory structure maintenance, separation, setback requirements, use of extension cords, fire hazards, rubbish, and other health and safety issues. The inspection may also include verification of current registration of the MH-unit in the park.

Request to Accompany Inspector

Upon request and approval by the assigned park inspector, one park representative and one resident representative may accompany the inspector during the initial inspection. The privilege of attending the inspection is at the sole discretion of the inspector.

Interior Inspections

Under normal circumstances, the Department will not be entering your home while conducting the inspection. The inspector may request entry only when conditions observed from the exterior of your home suggest that a potential hazard or substandard condition exist within the home. However, the right to grant or refuse entry into a home is at the discretion of the resident or homeowner.

If the inspector requests entry and you permit the inspector to enter, you will be asked to sign a statement acknowledging your permission. The permission will authorize only the inspector to enter your home on the date you specify. If you refuse entry, the inspector may seek a search warrant in order to gain entry based on the possible existence of a hazard or substandard condition.

All lots, including access to yards, shall be accessible for inspection at all times.

Inspector Identification

The Department of Housing and Community Development Inspector will be wearing a blue vest bearing the Department logo, which incorporates the State Seal. The Department's inspectors also carry identification cards with their facial photograph. To ensure your privacy and safety, you may ask the inspector entering your lot for identification.

Legal Action

Legal action to obtain a misdemeanor conviction for failure to comply with an issued Notice of Violation is avoidable. Such action is taken only when a resident refuses to make correction of conditions presenting hazards to occupants of the home, adjacent homes, or the general public.

Notice of Violation

A Notice of Violation letter will be generated detailing each violation that was observed during the initial inspection. This letter will be mailed to the resident of the lot that was inspected. The park <u>will</u> <u>not</u> be notified of your violations when the initial inspection has been completed. Additionally, the park will not be notified unless the violation constitutes an imminent health and safety hazard representing an immediate risk to life, health, or safety. If you receive a notice of violation, please refer to pages 4-14 of this booklet using the violation reference codes listed in the Notice of Violation letter for more information about possible steps you may take to correct the violations.

Time Allowed for Correction

The initial Notice of Violation allows 60 days from the date reflected on the Notice of Violation letter for the park and its residents to correct the violations. However, violations that present an imminent

health and safety hazard representing an immediate risk to life, health, or safety require immediate correction.

Reinspections

After the expiration of the initial time allowed to correct violations, the Department will conduct a reinspection to verify compliance with any issued Notice of Violation. Should your violations remain uncorrected after the first reinspection, a copy of your Final Notice of Violation letter will be provided to the park operator or responsible person pursuant to Health and Safety Code 18420(b)(1). The Final Notice of Violation allows an additional 30 days from the date of the letter to correct your outstanding violations.

Items for the Park Resident to Inspect

Prior to the Department's inspection, park residents may eliminate many violations by inspecting their lots and MH-units. The following is a list of commonly found resident violations. The Department will cite these conditions if found to endanger life, health, or the safety of the public or occupants. The following information is not regulatory language, but a guide for your inspection.

Common Resident Violations and Codes:

1. Registration

A mobilehome is to be currently registered and is to display the appropriate registration, license plate, or local property taxation decal. Display evidence of the current registration or local property taxation status or provide evidence to the park management or to the Department inspector.

2. Permits

Code REAP

If any of the following changes have been performed without a valid permit, you are encouraged to obtain a permit prior to the Department's park-wide inspection in order to avoid possible penalties:

- a. Installation, construction, or alteration of the following requires a permit from the Department of Housing and Community Development:
 - any accessory building, or structure, including porches, awnings, or room additions.
 - any storage cabinet exceeding 120 square feet.
 - any electrical, mechanical, or plumbing equipment
 - any fuel gas equipment
- b. Installation of a mobilehome within the park requires a permit from the enforcement agency.

Note: Prior to construction of any project, verify with the Department if the park is located in a Fire Hazard Severity Zone or Wildland Urban Interface Fire Area (WUI) as restrictive construction standards may apply to your project.

3. Emergency Exiting

Code RFEG

- a. To ensure safe exiting during an emergency, remove any obstruction which would prevent exterior doors from opening.
- b. Remove hasps and padlocks installed on the exterior of the home. In the event of an emergency, exit doors locked by a padlock or hasp prevent the door from being opened from the outside and will trap the occupant inside.

4. Debris and Combustible Storage

Code RFDB

Inspect the areas under and around the unit and remove any accumulation of refuse, garbage, combustible debris such as paper, leaves, dry grass, scrap wood, and other combustible materials.

5. Animals

Code RGAN

Domestic animals, including cats, shall not roam free in the park and the lot shall be maintained and reasonably cleaned of domestic animal waste.

6. Appliances

Codes REAP and REEC

- a. Appliances located outside of a unit must be protected from the weather. Locating them under an awning is not acceptable. They must be in some type of enclosure.
- b. Electrical power to an outdoor appliance is to be provided only through a permanent wiring means; extension cords are not permitted.

7. Multiple Units on a Lot

Code RGMU

a. Only one unit may be installed on an individual lot.

Exception: A self-propelled recreational vehicle or truck mounted camper may be parked on the lot when it is used as a frequent means of transportation. The self-propelled unit may not be connected to the utilities or interconnected to the other unit on the lot.

b. A camper, intended for truck mounting, may not be removed from the truck and placed on the lot. A truck camper shell is not considered a camper.

8. Mobilehome or Recreational Vehicle Setbacks from Lot Lines

Codes RFMRV and RFMRV1

a. A mobilehome unit must have the required 3-foot clearance from all lot lines. If the unit is placed within 3 feet of the lot line, relocation may be required.

b. A unit must be 6 feet away from a combustible structure on an adjacent lot.

Exception: A unit bordering a roadway or common area may be installed up to the lot line which borders the roadway or common area.

9. Substandard Manufactured Home/Mobilehome or Recreational Vehicle

Codes REMP and RSWP

A unit in substandard condition may be ordered removed from the park unless the substandard conditions are repaired. Substandard conditions may include, but are not limited to:

a. Structural hazards such as deteriorated floors, buckled walls, deteriorated roof members, etc.

- b. Electrical hazards including bare wires, unprotected cables or conductors, open splices, etc.
- c. Improper plumbing to include leaking fixtures.
- d. Mechanical hazards including unvented or improperly vented gas appliances.
- e. Faulty weather protection such as roof leaks, broken windows, damaged siding, etc.

10. Power Cords

Codes REFA2, REPC1, REPC4, and REPC5

A large rubber-coated type electrical cord used to power a unit should be inspected to ensure:

- a. The covering on the cord is not cracked or deteriorated.
- b. The area of the plug is not damaged or pulling away from the cord.
- c. The cord is not cut or spliced.
- d. The power cord plug has not been removed and the cord is not directly wired to the park electrical service.
- e. The power cord is listed and approved for manufactured home, mobilehome. or recreational vehicle use.
- f. The cord is not buried in the ground or encased in concrete.
- g. The unit does not have more than one power supply cord.
- h. An approved adapter, not more than 12 inches in length, in use prior to July 7, 2004, will be allowed its continued use provided it is installed and maintained in a safe operating condition.
- i. The power cord is not rated less than the electrical load of the unit. Example: If the unit's cord is rated at 30 amperes and the unit load is 50 amperes, the 30 amperes cord is not allowed.
- j. The unit's lot pedestal amperage does not exceed the power supply cord or feeder rating.

11. Feeder Assemblies

Codes REFA1, REFA2, and REFA3

A unit that is electrically connected to the lot's electrical service by a flexible metal conduit (feeder assembly), should be inspected to ensure:

- a. The conduit is buried or in contact with the ground.
- b. The conduit provides continuous, complete protection of the electrical conductors inside.
- c. No more than one "feeder assembly" is utilized to supply power to the unit.

d. The feeder assembly is not rated less than the electrical load of the unit. Example: If the unit's feeder assembly is rated at 30 amperes and the unit load is 50 amperes, the 30 amperes feeder assembly is not allowed.

Exception: An air-conditioning unit and/or a circuit to an accessory structure may be permanently wired to the lot pedestal provided the lot service can accommodate the additional load. A permit is required for this installation.

12. Wiring Methods

Codes REAC2, REAP, REEC, REFA3, REWM1, and REWM2

The general electrical conditions affecting the unit should be inspected to ensure that:

- a. Extension cords cannot be used in lieu of permanent wiring.
- b. Appliances cannot be installed outside the unit or accessory structure; the equipment should be installed inside a structure using approved wiring methods.
- c. The cables and conductors for electrical wiring installed outside a unit are protected against physical damage by installing the wiring in conduit.
- d. The electrical equipment installed outdoors is approved for wet or damp locations.
- e. All the parts or components of the electrical equipment of the unit, or equipment for accessory uses, are installed so that no energized parts are exposed.
- f. The lot electrical service equipment is accessible at all times. Remove any stored items or permanent construction obstructing access to the lot electrical service equipment.
- g. The unit is electrically grounded to prevent electrical shock.

Note: If you believe that one or more of the above conditions affect the electrical system of your mobilehome unit, it is recommended you consult a licensed electrician for assistance and correction of the condition. Permits are required prior to the installation of any electrical wiring.

13. Gas Meter

Code RPMA

The gas meter regulator and shutoff valve provided on the lot must be accessible at all times and be in a well-ventilated location.

14 Gas Connectors

Code RPGC2

Inspect the condition of the gas system connector. It should be a single flexible gas connector not over 6 feet in length, listed for exterior use, and not buried or otherwise in contact with the ground.

15 Propane Gas Tanks

Codes RPLP1, RPLP3, and RPLP4

When a unit is supplied by external liquefied petroleum gas (LPG) tank(s), inspect the tank(s) to ensure:

- a. The lot gas connection from the unit to the lot gas meter is by an approved flexible gas connector listed for use for a manufactured home/mobilehome or RV and is listed for exterior use.
- b. The total of all tanks on the lot does not exceed 125 United States gallons. If the total exceeds 125 US gallons, the more restrictive provisions of the Unfired Pressure Vessel Safety Orders, California Code of Regulations, Title 8, Chapter 4, Subchapter 1, would apply.
- c. Secure LPG vessels to prevent accidental overturning by securing to the unit's hitch, a support post, or other approved means.
- d. There is adequate clearance around the LPG vessel installed on the lot. Minimum clearance from the filling connection or vent to sources or ignition, direct vent appliances, and mechanical ventilation air intakes:
 - Minimum 10 feet for purposes of filling.
 - Minimum 5 feet to pressure relief valve and the valve must be directed away from the openings in building below the valve.
 - The tank cannot be located in areas with less than 50 percent open ventilation or under the unit.

Note: Lot electrical service is not considered a source of ignition.

- e. LPG vessels are not stored inside or underneath the unit, a habitable accessory building, or an accessory structure that is not open more than 50 percent for ventilation. Exception: personal portable appliances, such as barbeques, may be stored in enclosed areas.
- f. When installed in a flood zone, the LPG containers should be anchored to prevent floatation.

16. Gas Lines

If the gas piping system has been properly extended to reach the park's gas inlet, the extension pipes must be supported. Support the pipe with metal hangers at maximum 4-foot intervals.

17. Water Heaters

Codes RPWH1, RPWH2, RPWH3, and RPWH6

Inspect the unit's water heater for minimum safety requirements to ensure:

a. The gas water heater is properly vented to the exterior of the home.

- b. Access to the water heater is unobstructed.
- c. The water heater compartment is weather tight and protected from the rain, elements, etc.
- d. The water heater has functional temperature and pressure (T & P) relief valve. Extend the T & P valve piping to the underside of the mobilehome unit with piping suitable for use with hot water. T & P valve piping shall be the same size as the valve opening, must extend to below the floor of the unit, and must not have threads on the open end.
- e. The water heater has adequate openings into the compartment for combustion air.
- f. The water heater has the required clearances from its vent at the ceiling of the compartment and has sufficient clearances from its sides to the combustible walls of the compartment.

Note: If there is a problem with the water heater or its installation, refer to the water heater manufacturer's installation instructions or consult a licensed plumbing contractor.

18. Sewer Drains

Codes RPDS1, RPDS2, RPDS3, and RPMS

- a. The sewer drain connector on the unit should be inspected to ensure:
- b. The sewer drain is gas-tight and leak free.
- c. The sewer drain is sloped to drain a minimum of ¹/₈ inch per foot for 4 feet, and ¹/₄ inch for 3 feet.
- d. The sewer drain is supported every 4 feet.
- e. The drain piping is constructed of a minimum schedule 40 ABS plastic approved for drain and waste use.
- f. The connection to the lot sewer inlet contains a flexible connector.
- g. Recreational vehicles connected to the lot drain in the park for more than three months must have a sewer drain connection consisting of a minimum schedule 40 ABS plastic piping approved for drain and waste use. A flexible recreational vehicle hose-type drain is only acceptable as a temporary connection and is not approved as a permanent connection.
- h. All drain fixtures discharge into an approved sewer or septic system.

19. Water Supply Connector

Codes RPWS1, RPWS2, and RPWS3

Inspect the fresh water supply connector on the unit to ensure:

- a. The fresh water supply connector and shut-off valve on the unit are leak free.
- b. The fresh water supply connector is made of a flexible material approved for potable water such as soft copper tubing not less than ½ inch in diameter.

- c. There is a water shut-off valve installed on the unit.
- d. Permanently installed water filtration or conditioning equipment is installed in an approved manner with a permit.

20. Exits

Code RSSW1

Every exit door on the mobilehome unit has properly installed stairs, ramps, and/or landings which comply with the Department's regulations.

21. Stairways

Code RSSW2

Stairways at each required exit door are required to be safe and stable and should be inspected to ensure:

a. The risers of the stairways do not exceed 7 and $\frac{3}{4}$ inches in height. Risers should not vary by more than $\frac{3}{6}$ inches.

- b. The stairway treads are not less than 10 inches in depth. Treads should not vary by more than $\frac{3}{10}$ inches.
- c. The stairway width is not less than the width of the door.
- d. Recently constructed stairs much comply with the California Residential Code (CRC) requirements.

22. Stairway Landings

Code RSSL4

When an exterior door swings outward, a stairway landing is required and should be inspected to ensure:

- a. The landing is not lower than 1 inch below the bottom of the unit's door.
- b. The landing width and length is not less than the door width.
- c. Stairway landing is structurally sound.

23 Guardrail for Porches and Decks

Codes RSGR1 and RSGR4

The guardrails for a porch or deck that are at least 30 inches or more above grade should be inspected to ensure:

a. The guardrail is at least 36 inches in height above the floor prior to January 1, 2008.

Note: New guardrails on a mobilehome unit constructed on or after January 1, 2008 must be 42 inches in height above the floor.

- b. The openings between intermediate rails should not allow a 4-inch sphere to pass through the openings.
- c. The railings must be structurally sound.

24. Guardrail for Ramps

Code RSGR2

The ramp guardrail should be inspected to ensure:

- a. If the ramp is 30 inches or more above grade, guardrails are installed on at least one side of the ramp provided the other side is closed and extended the full length of the ramp.
- b. The guardrail is at least 36 inches in height above the floor.
- c. The openings between intermediate rails should not allow a 4-inch sphere to pass through the openings.
- d. The guardrails are structurally sound.

25. Handrails for Stairs

Codes RSHR1 and RSHR2

Any stairway to a mobilehome unit or accessory structure (deck, porch, room addition, etc.) more than 30 inches above grade should be inspected to ensure:

- a. Stairs serving porches constructed more than 30 inches above grade are equipped with intermediate rails that do not allow a 4-inch sphere to pass through the openings.
- b. Handrails are not less than 30 inches or more than 34 inches in height, as measured vertically from the nosing of stair treads, or not less than 34 inches or more than 38 inches in height if constructed after July 7, 2004.
- c. Handrails and intermediate rails are structurally sound. Secure any loose rails.

26. Skirting

The skirting of a mobilehome unit should be inspected to ensure that the ventilation and access under the manufactured home/mobilehome ensure:

- a. When skirting is installed, an underfloor access panel is required. The panel must be 18 by 24 inches unobstructed by pipes, ducts, or other equipment that may impede access.
- b. A minimum 1 and ½ square feet of ventilation is required for each 25 linear feet of skirting. The openings for ventilation shall be provided on at least two opposite sides as close to the corners as possible.
- c. Where wooden materials are used for skirting, any wood in contact or within 6 inches of the earth must be decay and insect resistant wood, such as redwood.

27. General Accessory Structure Requirements (Awnings, Carports, Decks and Porches)

Codes RFAC, RFAC1, RFAC2, RFPD, RFPD1, RSACS, RSACS1 and RSPD

Inspect general accessory structures including awnings, carports, decks, and porches to ensure that:

- a. Missing, damaged, or unanchored supports are repaired.
- b. Combustible accessory structures are a minimum of 3 feet from the lot line and are not less than 6 feet from any combustible unit, accessory building, structure, or building component on an adjacent lot. However, 4 inches by 4 inches nominal wood support posts on aluminum awnings may be located up to a lot line.
- c. Awnings and carports may extend to the lot line which borders a roadway.
- d. Wooden awnings and carports are free standing or have a permit for the attachment to the unit.
- e. Metal awnings and carports do not project over the lot line.
- f. All non-combustible accessory structures must maintain a minimum 3 feet from any unit, accessory building, or structure on an adjacent lot.
- g. The structure is sound and in good condition.

28. Awning or Carport Enclosure

Codes RFAE, RFAE1 and RSACE

Awning enclosures are permitted for outdoor recreational use only and should be inspected to ensure:

- a. Any combustible structural components of the enclosure are a minimum of 3 feet from a lot line except when the awning enclosure borders a roadway or common area.
- b. Awning enclosures or carports are to be free standing and not attached to the mobilehome unit.
- c. The structures cannot project over the lot line.
- d. Any electrical equipment installed is suitable for damp location.
- e. The enclosure is structurally sound.

29. Cabana or Room Additions

Codes RFCB and RSCB

Inspect room additions to ensure:

- a. The structure meets minimum standards for weather, protection, electrical wiring, plumbing, and structural integrity.
- b. There is at least a 3-foot separation to the lot line.

30. Storage Cabinets or Sheds

Codes RFSC and RFSC1

Inspect storage cabinets or sheds to ensure:

- a. The storage cabinet or shed is structurally sound.
- b. The structure is not installed within 3 feet of a lot line except when the lot line borders a park roadway or common area.
- c. Structure is constructed with combustible material and is within 3 feet of the lot line. Provide a 3-foot separation from the property line.
- d. If the structure is noncombustible, the storage cabinet or shed may be installed up to the lot line provided there is a minimum 3-foot separation to any structure on the adjoining lot.
- e. Storage sheds or cabinets exceeding 120 square feet in dimension require a permit from this Department. The total floor area of all storage cabinets on the lot does not exceed 120 square feet.

31. Miscellaneous Structures

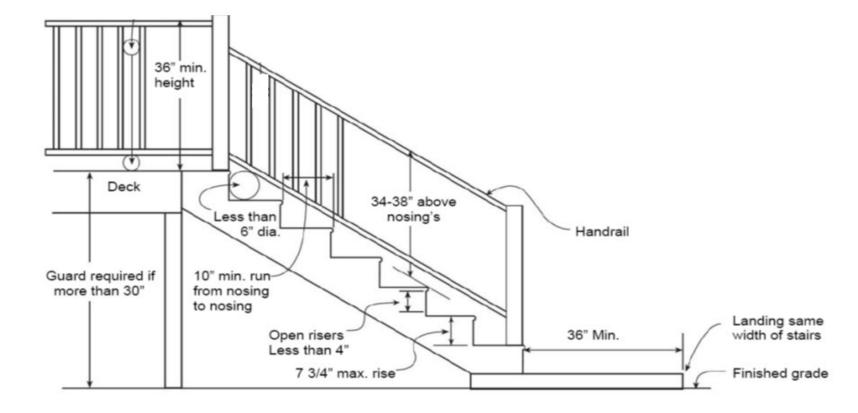
Codes RSGSB, RSMS3, and RSMS4

Inspect garages, greenhouses, and storage buildings to ensure:

- a. The setback to the unit is a minimum 6 feet; however, garages and storage buildings with one-hour firewall construction may be up to 3 feet to the unit on the same lot.
- b. Garages, greenhouses, and storage buildings constructed of combustible material are a minimum of 3 feet from the lot line, except when they border a roadway or common area within the park.
- c. The structure is sound and in good condition.



Mobilehome Exterior Self-Supporting Stairway Drawing





Mobilehome New Exterior Self-Supporting Stairway

California Residential Code (CRC)

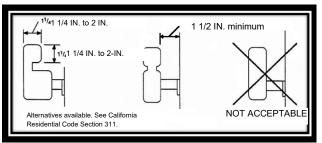
Stairway Drawing Notes:

- 1. Stairway shall not be less than 36 inches in width.
- 2. Stairway risers (rise) shall not be greater than 7 and $\frac{3}{4}$ inches.
- 3. Stairway treads (run) shall be a minimum of 10 inches.
- 4. The length of treads and the height of risers shall not vary more than ³/₆ inch.
- 5. Riser openings shall not exceed 4 inches between the treads.
- 6. The nose of each tread with solid risers must be between $\frac{3}{4}$ inch and 1 and $\frac{1}{4}$ inches.
- 7. Composite materials may require additional framing. Refer to the manufacturer's installation instructions.
- 8 Stairways are required to be illuminated, including landings and treads.
- 9. Where the top of the guard also serves as a handrail on the open side of a stairway, the top shall be no less than 34 inches and no more than 38 inches above the edge of the treads.
- 10. When installed in a Fire Severity Zone, walking surface material of stairways or decks shall comply with CRC Section R337.9.
- 11. Stringers shall be positively anchored to the primary self-supporting structure to resist lateral and vertical forces. (Toenailing is not acceptable to accomplish this.)
- 12. If one side of the stairway is solid or a wall, guardrails are only required on the open side. Otherwise, guardrails are required on both sides.
- 13. Continuous handrails are required on at least one side.

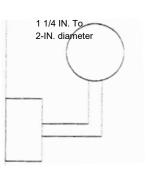


HCD Mobilehome Handrail Drawing

HANDRAILS

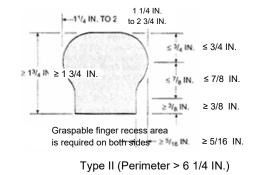


Handrails are required on at least one side when stairways have four or more risers.



Type I (Circular)

HANDRAIL GRIP EXAMPLES



California Residential Code

Quick Code References

Exterior Stairway Illumination Requirements

Exterior stairway illumination* - Section R303.7

Glazing Adjacent to Stairways

Glazing adjacent to stairs* - Section R308.4.6 Glazing adjacent to the bottom stair landing* - Section R308.4.7

Guardrails

Guard requirements - Section R312.1 Where guards are required - Section R312.1.1 Guard height requirements* - Section R312.1.2 Opening limitations* - Section R312.1.3 Loads - Table R301.5

Handrails

Handrails - Section R311.7.8 Height*- Section R311.7.8.1 Continuity* - Section R311.7.8.4 Grip-size - Section R311.7.8.5 Loads - Table R301.5

Materials and construction methods for exterior wildfire exposure

Section R337

Landings and Walking Surface

Landings for stairways* - Section R311.7.6 Stairway walking surface - Section R311.7.7

Stairway Widths and Headroom

Stairway Width* - Section R311.7.1 Stairway Headroom* - Section R311.7.2

Stairway Treads, Risers and Nosing

Stair treads and risers - Section R311.7.5 Stair risers (rise)* - Section R311.7.5.1 Stair treads (run) - Section R311.7.5.2 Tread nosing* - Section R311.7.5.3 Attachment – Section R311.5

*Section includes exceptions

A permit (form HCD 50) is required from HCD when a deck's landing exceeds 12 square feet and is in an HCD Mobilehome Park. T25 CCR Section 1018(d)(5). Always refer to the actual and current text of applicable laws and regulations. The California Residential Code is available at www.bsc.ca.gov/codes. This document is not intended to be all-inclusive. Unaltered existing stairways are subject to the requirements that were in effect during the original approval or installation.